

Tisa, Kimberly

From: Tisa, Kimberly
Sent: Tuesday, May 26, 2015 1:47 PM
To: 'Jon Odonnell'
Cc: nick.hodgkins.maine.gov; rpatten.crederellc.com; matthew cameron
Subject: RE: Cousens Memorial PCB Abatement Plan

Jonathan:

EPA has read your revised plan and the proposed abatement is the same. That is, the two PCB-impacted windows, 60 LF of caulk and one course of associated brick around each window will be removed for off-site disposal. Four verification samples will be collected around each window to confirm PCB concentrations are < 1 ppm.

As I previously indicated in my May 18, 2015 email, once the disposal issue was clarified, it appeared that the work could proceed as proposed in accordance with 40 CFR 761.61 and 761.62 without further approval from EPA.

You subsequently clarified that the PCB waste would be removed/disposed in accordance with 761.75. However, the cover letter on your revised plan still appears to ask for EPA approval of the project in accordance with § 761.61(c) and § 761.79(h). Since the caulk is being removed with the brick intact, I don't think approval under § 761.79(h) is necessary. I'm not clear on the § 761.61(c) part of your request. Please clarify what the § 761.61(c) part of this project is.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
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From: Jon Odonnell [mailto:jodonnell@crederellc.com]
Sent: Monday, May 18, 2015 11:12 AM
To: Tisa, Kimberly
Cc: nick.hodgkins.maine.gov; rpatten.crederellc.com; matthew cameron
Subject: RE: Cousens Memorial PCB Abatement Plan

Kim,
Thanks very much. Section 5.6 has been changed. PCB Bulk Product Waste and attached substrate will be disposed of at a hazardous waste landfill approved under 40 CFR 761.75. PPE, etc., will also be disposed of at a hazardous waste landfill approved under 40 CFR 761.75. This is now consistent across these sections. Attached is the revised plan.

Jonathan O'Donnell
Project Manager
Hazardous Building Material Specialist

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Tisa, Kimberly 5/26/2015 3:25 PM
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Community Revitalization, Economic Development, and Environmental Remediation and Engineering

From: Tisa, Kimberly [<mailto:Tisa.Kimberly@epa.gov>]
Sent: Monday, May 18, 2015 9:56 AM
To: Jon Odonnell
Cc: Tisa, Kimberly; nick.hodgkins.maine.gov
Subject: Cousens Memorial PCB Abatement Plan

John:

As indicated in your most recent plan dated April 7, 2015 for the Cousens Memorial School in Lyman Maine (see attached summary table above), PCBs ≥ 50 ppm were identified in an exterior white caulk associated with 2 northern most ground-level windows located on the northeast side of the building. Brick surrounding these windows has also been determined to contain > 1 ppm PCBs (high of 1.5 ppm). The windows and one course of associated brick will be removed for off-site disposal. Four verification samples will be collected around each window to confirm PCB concentrations are < 1 ppm.

EPA did identify one potential discrepancy in the plan. In one section (Section 5.3) it appeared to be indicated that the waste would be disposed of pursuant to 761.62(a). Under this authorization, *PCB bulk product waste* would go to either a TSCA-permitted landfill under 761.75 or to a RCRA hazardous waste landfill. However, Section 5.6 of the plan indicates that the caulk/brick would go to a state or municipal landfill per the provisions of 761.62(b) and that PPE, etc would go to a landfill permitted under 761.75. Thus, clarification on waste disposal is requested.

Once the disposal issue is clarified, as I previously indicated in my February 26, 2015 email to you, the Notification appears to be complete with respect to the caulk and brick, and the work may proceed as proposed in accordance with 40 CFR 761.61 and 761.62 without further approval from EPA. This appears reasonable given only 2 windows have been identified to have the caulk (< 60 LF) and given that the proposed work appears to meet the prescriptive requirements without need for a risk-based finding under either 761.79(h) and/or 761.61(c). The storage, marking, recordkeeping, manifesting, and decontamination requirements would also apply. We would also request submittal of a Completion Report documenting that the work was conducted as described.

I did contact MEDEP regarding the paint, which Credere has determined to meet the definition of an *Excluded PCB Product* as defined under 40 CFR 761.3. According to Nick Hodgkins, MEDEP has allowed unabated < 50 ppm PCB paints to remain in-place with deed restrictions that require proper maintenance, management, handling and disposal should renovation or other actions disturb these materials. Thus, I am assuming you will be working with MEDEP to address any state requirements necessary regarding these paints.

Should you have any questions, please feel free to contact me.

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